

**UNITED STATES DISTRICT COURT FOR
THE SOUTHERN DISTRICT OF NEW YORK**

UNITED STATES OF AMERICA,	X	
	:	
	:	
v.	:	
	:	
JAMES GATTO,	:	
a/k/a "Jim,"	:	Case No. S2 17-cr-00686 (LAK)
MERL CODE, and	:	
CHRISTIAN DAWKINS,	:	
	:	
Defendants.	:	
	X	

CERTIFICATE OF SERVICE

The undersigned, a member in good standing of the Bar of the United States Court for the Southern District of New York, certifies that on September 25, 2018, she caused to be served upon the Government true and correct copies of Defendants' Memorandum of Law in Opposition to the Government's Fourth Motion *In Limine* to Preclude Questioning Regarding Misconduct by FBI Agents.

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Dated: September 25, 2018



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